

Schedule for Initial Training of Communication Assistants			
Day One	Day Two	Days Three through Ten	
Introduction to the Communicatively Challenged Community	Methods of Communication for the Communicatively Challenged Community	Fundamental Instruction in Technology and Procedures for Relay Service	

DEAF CULTURE OUTLINE

Initial Traini	ng of Communication Assistants, Days One & Two		
I. Intro	Introduction to the Deaf Community and Relay: Day One		
Α.	The Role of the CA and Customer Diversity		
В.	History of Deaf Culture, Education, and Sign Language		
C.	In The Spotlight: Notable Deaf individuals and their accomplishments		
D.	Common Questions about Deafness		
E.	Americans with Disabilities Act (ADA)		
	1 ADA & FCC Requirements for Relay Service		
	2. FCC Requirements – 64.604 for Relay Personnel		
II. Methods	of Communication: Day Two		
Α.	Introduction to American Sign Language (ASL)		
B.	ASL Guidelines and Grammar Rules		
C.	ASL Gloss		
D.	Understanding ASL Translation/Interpretation		
	ASL Translation/Interpretation as the Default		
	2. Identifying Translation/Interpretation preferences - Relay Choice Profile		
E.	Idioms in Deaf Culture - English and ASL		
F.	Procedures for obtaining Relief		
	esources: Books, Tapes and Websites Related to ard of Hearing		

This is the first training every new relay employee receives when hired as a Communication Assistant. The training is for two days and is delivered by one of our AT&T Relay Account Team managers, a member of the Deaf and Hard of Hearing community. The training is participatory, and for most participants is a fun and memorable introduction to the world of relay. At various points in our Deaf Culture







training, written knowledge checks occur, ensuring that CAs have grasped the pertinent details of the module just covered.

An ASL diagnostic is given and must be passed before a CA is allowed to process live calls. This diagnostic covers ASL translation and interpretation. AT&T will gladly share the specific test upon request.

Once the new relay employee has completed the Deaf Culture Training, the focus of the Initial Training program then pivots to the "technical" portion of the training, i.e. how to successfully complete relay calls. The concepts introduced during deaf cross-cultural training are then integrated into and reinforced throughout the next eight days of procedural instruction.

CA Initial Training Outline

The following is a high level outline of our Initial Training for new employees.

Initial Training Outline

Initial Training Outline For AT&T Communication Assistants				
	A.	Gule 1 – Introduction to Reley Service		
	a.	Explanation of Relay Service		
	b.	Identifying Customers Who Use The Relay Service		
	C.	Explanation of How Relay Service Works		
	d.	The Role of the Communications Assistant (CA)		
	e.	The Customers' Expectations For Relay Service		
	f.	Comparison of a Relay Call to a Call with an Operator		
	g.	Availability of Relay Services		
	h.	Code of Ethics – Rules for Relaying Calls - Relaying Verbatim, Appropriate tone for content and intent of conversation		
	i.	Other Relay Operator Requirements		
	Module 2 – Introduction to the TTY			
	a.	Background of the TTY		
	b.	Parts of the TTY		







	C.	Connecting a TTY to a Telephone System	
	d.	Explanation of How a TTY Works	
	e.	How to Use a TTY To Place a Call	
	f.	Other Communication Devices	
	Мо	dule 3 – Introduction to the CA Work Station and Call Conditions 🦠 🌞 🦼	
	a.	Equipment Used by CAs	
	b.	Customer Information Displayed for Call Processing	
	c.	Preparing Billing Records	
	d.	Basic Call Process Steps	
		1. TTY-Voice, Voice-TTY	
	<u> </u>	2. In Call Replacement	
		3. CA Relief Procedures	
		4. Gender Requests	
		5. Relay Choice Profile (RCP)	
continue de la Sel	- Anni Maria	6. Personal Memory Dial (PMD)	
IV.	1. Module 4 – Introduction to Voice Carry-Over (VCO) Calls		
	a.	Explanation of Voice Carry-Over Calls	
	b.	Procedures for Processing VCO Calls	
		1. Profiled	
		2. Not Profiled	
		3. TTY to Voice	
	Maria da Sangara	4. Voice to TTY	
V .	Ис	dule 5 – Basic Relay Calls	
	a.	Recorded Messages/ PBD (Play Back Device) Usage	
	b.	Procedures for Placing Calls to Beepers/Pagers	
	C.	Toll Free Number Completion (800, 888, 866, 877)	
10.000 1 0.000 -00.00	d.	Directory Assistance (DA) Call Completion	
VI.	Ис	Module 6 - CSIDS	
	a.	Review of Commonly Used CSIDS Keys	
	b.	b. CSIDS Quick Reference	
	C.	c. Emergency Number Retrieval	
	d.	Domestic "General" Rate Quote	
	e.	Domestic "Computed" Rate Quote	

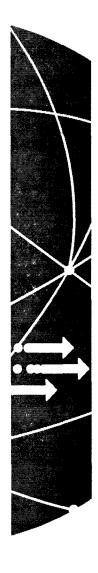


f. International "General" Rate Quote g. International "Computed" Rate Quote h. Collect/Calling Card Billing to International Countries	·		
h. Collect/Calling Card Billing to International Countries			
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i. Canada			
j. Frequently Asked Questions & Key Actions			
k. Keyword Help			
VII. Module 7 – Emèrgency Calls			
a. Definition of Emergency Call			
b. Call Steps for Securing Emergency Agency			
c. Emergency Call Handling Procedures			
YIII. Module 8 - Afternate Billing			
a. Alternate Billing Requests			
b. Collect Calls			
c. Third Number			
d. De-tariffing Order			
e. Person to Person			
f. Calling Cards g. Commercial Credit Cards h. Prepaid Calling Cards			
		i. Coin Phone	
		j. Special Treatment Windows (STW)	
IX. Module 9 – Carrier of Choice			
a. Indentifying Carrier of Choice (COC) Calls			
b. Relay Choice Profile Includes COC			
c. COC Requested During Call Set Up			
d. Using COC Calling Card			
e. Current Listing of COC			
f. Procedures for Non-participating COC			
g. Billing Procedures for COC			
* Medule 10 4 Specialty Call Types / Call Processing			
a. 711 Dialing			
b. Spanish Voice and TTY Transfers			
c. 900 Pay Per Call			









		1. 900 Number Requests	
		900 Number Terminates to Recorded Message	
		900 Number Answered by Live Person	
		4. Calls That Can Not Be Completed to 900 Numbers	
_	d.	511 Calls	
	e.	STS Overview	
		Identifying Speech-To-Speech Calls	
		2. Processing STS Calls	
	f.	Telebraille Customers (Pacing)	
	g.	Hearing Carry-Over (HCO)	
		Explanation of HCO Calls	
		2. Comparison of HCO to VCO	
		Procedures for Processing HCO Calls	
	h.	Specialty Call Types	
		Two-Line VCO or Voice Translation	
		Reverse Two-Line VCO or Voice Translation	
		Two-Line HCO or Hearing Translation	
		4. Voice to Voice (VTV)	
		5. Voice to TTY (VTT)	
		6. VCO Privacy	
		7. HCO Privacy	
		8. Hearing to Hearing (HTH)	
		9. VCO to HCO (VTH)	
		10. Touch Tone Carry-Over (TCO)	
		11. 3-way Calling	
		12. Revised SLAM Procedures	
		13. SLAM Procedures	
	i.	International Calls	
	j.	Calls Terminating to Another Relay Center	
	k.	Hold Guidelines	
	I.	Customer Contact Process (Requests for Supervisor or Customer Care)	
	m.	Internet Relay	
	n.	Instant Message Relay	



XI.	Μo	dule 11 – Introduction to OSD	
	a.	Explanation of Operator Services for Deaf (OSD)	
	b.	Comparison of OSD to Relay Service	
	C.	Type of Calls That are Permitted Through OSD and Availability	
1.	Mo	dule 12 – DNIS Switched Calls	
	a.	Procedures for TTY to TTY Calls	
		1. Relay to OSD	
		2. Relay to OSD to Relay	
		3. OSD to Relay	
ΧIII	Mo	dule 13 – Enterprise Relay	
	a.	Explanation of Enterprise Relay	
	b.	Enterprise Relay Clients	
	C.	Processing Enterprise Relay Calls	
	d.	Differences Between Enterprise Relay and Traditional Relay	
XIV.	Ио	odule 14 - Relay Choice Profiles	
	a.	Definition of Relay Choice Profile	
	b.	Relay Choice Profile Options	
	C.	Interpreting Relay Choice Profiles	
	d.	Call Handling Based on RCP Selections	

To reinforce training, we equip each AT&T workstation with an extensive CA Manual (Position Tool) that covers

- how to handle emergency and crisis calls,
- customer service,
- confidentiality, and
- general instructions for processing the numerous call types available through AT&T Relay Services.

The Position Tool also includes information on billing, line restrictions, and other pertinent information.

Speech-to-Speech Training





Although AT&T indicates that our Initial Training is 80 hours in length, this does not include our Speech-To-Speech (STS) training that is given to all CAs who place STS calls. Our STS training is 40 hours in length and is extremely comprehensive. This training is given to CAs after a fundamental relay competency is demonstrated. The following is our AT&T STS Training Outline.

AT&T Speech-to-Speech Training Outline
Module 1: History of STS
Module 2: CA Role and Traits
Module 3: Processing STS Calls
Module 4: Relay Choice Profiles
Module 5: Accurate Instructions and Dictation
Module 6: Call Conditions
Module 7: Voice Disorders
Module 8: Stuttering
Module 9: Laryngectomy
Module 10: Slow Speech
Module 11: Dealing with STS Anxiety
Module 12: CA Techniques and Strategies
Module 13: Dysarthria
Module 14: Aphasia
Module 15: Traumatic Brain Injury and/or Short-Term Memory Deficit
Module 16: Augmentative and Alternative Communication (AAC)
Module 17: Speech-to-Speech, A Vital Service
Module 18: STS CBT Module One
Module 19: STS Requirements



Module 20: STS Training Segments
STS Diagnostic
STS Evaluation

Eight hours of our STS training was developed and is facilitated by Speech Pathologist, Joe Sonnenberg. This part of the training introduces and educates CAs to many of the speech disorders a STS customer may have, for example, Dysarthria, Apraxia of Speech, Voice Disorders, Stuttering, and Laryngectomy. The training also consists of many video segments and interviews with individuals discussing their speech disorders and the many challenges they encounter in their daily activities. CAs are particularly responsive to this training and come away with a heightened sensitivity for our Speech-To-Speech customers.

On-Going Training

AT&T compensates CAs well and ensures that they have abundant training, support, and skills required to process relay calls effectively. This is one of the many reasons the quality of our service is so high. AT&T enjoys a strong union partnership with our workforce. Our employees are compensated well, allowing us to attract highly intelligent and motivated individuals who have a desire to work in the Relay industry. AT&T also offers a lucrative tuition assistance program that has allowed many employees the opportunity to further their education and attain a college degree while being employed as a CA.

AT&T considers ongoing training of our CAs an investment. We view our CAs as valued partners in providing excellent relay service.

AT&T employees receive **10 hours of annual Relay Refresher Training**. These training sessions include a wide variety of topics including:

- Reviews of Infrequent Call Types
- Reviews of Focus Areas Indicated by Quality Assurance Calls
- Reviews of Focus Areas Noted in Customer Commendations and/or Complaints
- ASL Review/ Interpretation
- Spelling and Grammar Review
- Typing Speed Enhancement







- New Methods and Procedures
- State Contractual Requirements
- FCC and ADA Principles

In addition to our 10 hours of annual relay refresher training, CAs and managers also participate in 12 hours of annual Disability Awareness Training. While general disability awareness is discussed and reinforced, we delve into the relay-community disabilities in an in-depth way. The training is given in modules for flexibility, and so not to inundate the learner with too much information at any given time. We find our employees retain the information longer when given in modules over time, versus in one longer workshop setting. We actively include channel managers and members of the Deaf Community in developing training that is valuable and comprehensive. AT&T recognizes that understanding Deaf culture is an integral part of providing a quality relay service. Managers and staff members working in the relay centers also participate in this training

These workshops are shown in Section III of the outline. The individual workshops are considered proprietary, but we'll gladly provide them to you upon request.

The following is a high-level outline of the on-going Disability Awareness Training we provide to our CAs.

	Ongoing Disability Awareness Training and Section 255 Responsibilities					
i Op	ening & Introductory Comments					
	tion 255 Was Enacted					
Α.	What is Section 255?					
В.	Why is it Important?					
_	It's the Law.					
	It's Good Business Practice.					
	It's the Right Thing To Do.					
	Why is it Important to You?					
III. Dis	ability Awareness -Types of Disabilities					
Α.	Legal Definition of Disability					
В.	Common types of Disabilities					
	Intellectual – Definition, Statistics					



Vision – Definition, Statistics		
Deaf Blind Specialty Training Module (workshop)		
Hearing – Definition, Statistics		
 Deaf Culture Specialty Training Module (workshop) 		
Speech – Definition, Statistics		
* STS Specialty Training Module (workshop)		
Dexterity – Definition, Statistics		
Seniors - Definitions, Statistics		
Did you know?		
Working with Customers Having Disabilities		
A. The Basics		
- TIPS - Review B-A-S-I-C		
- Vocabulary of Respect		
- Use of Handicapped		
B. Communicating with People with Disabilities		
Communication Tips and Techniques		
Ask		
Methods of communication		
C. Services, Product Features, and Functions		
V. Review and Quiz – Test your Awarenessi		

As an additive to AT&T Relay's training, AT&T CAs are all participants in Corporate Training. This training includes such topics as:

- AT&T Code of Business Conduct including Business Ethics and Integrity
- ADA Compliance
- Ergonomics Training
- Section 255/ Disability Awareness
- Customer Information and Privacy Protection
- AT&T Customer Rules! Customer Service Training
- Corporate Safety Training
- Others

As a unionized environment, AT&T also has an Alliance program that provides plentiful opportunities for CAs to enhance their skills. Alliance classes are arranged at the center







level to meet the needs and requests of the employees in a specific center. They are offered free-of-charge for the CAs and are jointly-supported by AT&T and the Union. Recent class offerings, just in 2011, include:

Class	Description
Word 2007	o Teaches participants basic functions of Word
Professionalism in the Workplace	Seminar is designed to teach participants to actively address issues such as health care, social networks, new careers
Powerpoint 2007	Teaches participants to create professional presentations, electronic slide shows, charts, diagrams, and other formatting options
Virtual Spanish	Introduces the participant to the Spanish language and culture. Participants practice vocabulary, grammar, reading, writing, and basic conversation.
Resume Writing	Course provides guidance for updating and writing resumes
CART	Communication Access Realtime Translation
Electronic Medical Records	 Course teaches Medical coding, billing, and transcription
Creative Writing Revisited	A series of three Creative Writing Seminars
Building Engagement and Renewal	Introduces participants to ways to self motivate in order to achieve personal and professional renewal. Seminar focuses on the ways in which physical, emotional, and spiritual health can contribute to a new-found sense of satisfaction both on the job and in other arenas
	 How to maintain contacts, multiple email accounts, install and delete apps, add music, manage photos, text and media messages and





Getting to Know	how to update your iPhone with iTunes to get
your iPhone	the full use of the iPhone
	Employees learn ways to be healthier and the
	long-term benefits of exercise related calorie-
Wellness Program	burning and body-energizing
	Hands-on course that teaches participants to
	discover the basics of photo editing and
Adobe Photoshop	sharing with Adobe Photoshop Elements.
Elements	
	 Course teaches participants how to install and
	use software to create scrapbooks, photo
Memory Mixer	albums, DVDs, and Calendars
Genealogist	o Teaches Genealogial research
	O Courses teach participants about editing
Photography	digital photos, creating photo calendars and
	other projects

Besides participating in formal training, our CAs participate in Outreach Events in their community and surrounding locales, to ensure their ongoing connection to/engagement with the relay users in their state.

In an effort to continually improve, AT&T intermittently conducts skill-based contests such as the "Relay Olympics" that CAs participate in to win prizes. These skill-based contests reinforce typing speed and accuracy, spelling, and other necessary relay skills.

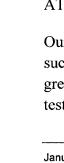
AT&T has a very dedicated CA workforce who does an exemplary job processing relay calls for all of our customers. They look forward to and are excited about the opportunity to provide quality service to Colorado Relay callers!

Typing

AT&T has a team of very skilled and experienced typists!

Our typing test for potential employment as an AT&T CA requires applicants to successfully type at a minimum of 60 words per minute with a maximum error rate of no greater than five percent using an audio-typing test. Subsequent to employment, CAs are tested quarterly with an audio-typing test and also observed during live calls by

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Supervisors to ensure they maintain a typing speed above the required 60wpm. Unlike some competitors, our typing tests do not use technological aids to assist in meeting the required wpm scores. Our software counts the total number of characters including spaces and divides that number by five to determine the words per minute.

If a CA does not meet the 60 wpm requirement, the CA is taken off line for further training that includes various typing exercises to improve typing speed and accuracy.

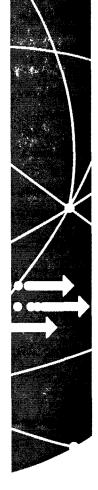
The average typing speed of our current CA Team is over 73 wpm – WITHOUT TECHNOLOGICAL AIDS. This is an average of our entire CA team. Some relay providers may indicate a word per minute score that was observed by independent test callers that reached only a small subset (as low as ten percent) of their CA workforce. AT&T's 73 wpm indicated here is an average of all of AT&T CAs including our newest CAs.

The chart below shows our typing speed breakdown for ALL of our centers combined. Over 50% of our employees type at a rate over 70 wpm.

Typing Speed	Percentage of Current AT&T Relay CAs
60- 69.9 wpm	49.8%
70- 79.9 wpm	20.8%
80- 89.9 wpm	19.1%
90- 100 wpm	8.3%
100- 109 wpm	2.0%

Some relay competitors may share third party independent studies indicating that their typing speed is greater than ours. As with any statistical study, it is imperative to ensure that comparable measurements are evaluated. Questions for consideration to ensure a level comparison include:

- 1. Does each provider have ALL of their centers processing these calls? For example, if a large provider has multiple centers and a large CA team, the sample should reflect a large percentage of their CA base (greater than 25%).
- 2. Typing evaluation based on verbatim versus abbreviated words. Are typing scores evaluated accurately considering abbreviations? Independent testers may be scoring abbreviations as fully-typed words. (i.e. rep has three characters or .6 of a word, representative has 14 characters or 2.8 words). This provides a statistical







advantage to CAs abbreviating extensively. AT&T does not allow CAs to abbreviate unless the customer abbreviates a specific word first. This ensures that the caller controls the call and understands all that is being typed. AT&T can abbreviate on Colorado Relay calls at the direction of the CPUC.

Although abbreviations may not seem to have a huge impact, consider the short verse below. This short verse has a total of 209 characters including spaces, or 41.8 words per minute if typed in one minute.

"If you require a representatives to assist you with your request, please call back during normal business hours. We are open Monday through Friday from eight AM to six PM and from eight AM to noon on Saturday."

Now the same text with abbreviations. This version has a total of 159 characters including spaces, or 31.8 words per minute if typed in one minute.

"If u require a rep to assist u with ur request, pls call back during normal business

Read what our Relay Service callers say about our Communication Assistants.

From a caller in Pennsylvania,

"The CA wasn't doing her job just to do it. She had excellent typing speed and was pleasant throughout my very long and rather boring call. She has wings and a halo."

hrs. We r open Mon thru Fri from 8 AM to 6 PM and from 8 AM to noon on Sat".

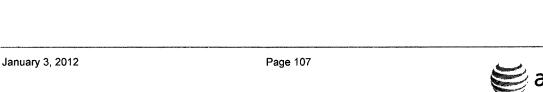
CAs typing abbreviated words will be given an extra 10 words per minute in their typing score. This is not a "true" depiction of typing ability since typing words per minute should be based on key strokes and not abbreviated versions of words with full credit for all characters, even those not typed.

AT&T is confident in the typing ability of our CAs. We receive unsolicited commendations regarding the quality and speed of our CAs when typing during relay calls.

This comment was unsolicited.

Typing Improvement

AT&T recognizes the impact that typing speed has on a relay call. We have computers available in each of our centers for CAs to use to improve their typing skills. We've provided software such as Mavis Beacon teaches typing and also provide a list of various websites that can be used for accessing typing games that improve typing skills. This provides variety and fun for our CAs as they develop this





fundamental relay skill. CAs can use computers in our centers to do this and to enhance their typing skills.

AT&T also initiates skill-based competitions at various times to improve typing speed. CAs compete with each other to be the "champion" in events such as our themed "Relay Typing Tournaments". These friendly competitions encourage the enhancement of typing skills as well as other relevant skill sets such as spelling and grammar.

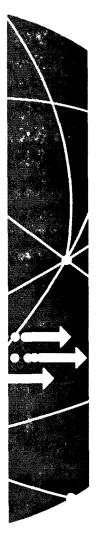
Spelling and Grammar Skills

AT&T has used a proven testing process in the hiring of thousands of highly qualified and professionally competent CAs since our entry in to the Relay industry in 1987. Our current CAs speak and write English grammar with a minimum of 12th grade expertise. In addition, AT&T CAs will be required to annually complete a Spelling and English Grammar Diagnostic at a minimum 12th grade level.

Approximately 30% of AT&T's current CA workforce has earned a college degree. Our CA team has demonstrated excellent spelling and grammar skills, beyond just the basics, for more than 20 years.

During initial training, CAs process simulated calls that require them to have adequate reading and spelling skills. After employment, AT&T continues to enhance and develop our CAs spelling skills by giving tests such as the one below that ensure they have spelling skills at a 12th grade level.

	A	В	С
1	adimant	adamant	adament
2	alusion	alluzion	allusion
3	amplatude	amplitude	amplittude
4	asymmetric	assymmetric	asymetric
5	authoratative	authoritative	athoritative
6	attypical	atypical	atyppical
7	distemper	disstemper	distempar
8	blerb	blurb	blourb
9	coreography	choreography	choreografy
10	culossus	colosus	colossus
11	cohession	cohetion	cohesion
12	commpression	compresion	compression
13	cundone	condone	condoene







14	conspirater	conspirator	consperator
15	contenuance	continuance	countinuance
16	coruptible	corruptible	corruptable
17	demonstrative	demonstritive	demonstrateve
18	desperado	desparado	desperato
19	disrepute	dissrepute	disrapute
20	dissipation	disipation	dissipasion
21	dommestic	domestic	domestik
22	ducktile	ductile	ducteil
23	ecentric	eccentric	eccentrick
24	domenation	domination	dominasion
25	atrition	attrition	attrision
26	imporium	emporium	emporrium
27	expresseve	expresive	expressive
28	factious	fatious	facktious
29	ferocity	farocity	feracity
30	forthright	fourthright	forthreight
31	fusible	fusable	fussible
32	hetergeneous	heterogeneous	heterogeous
33	endulgence	indulgence	indulgance
34	inumerable	innumerable	innummerable
35	rationalle	rasionale	rationale
36	jaaded	jadded	jaded
37	legislitive	legeslative	legislative
38	kinectic	kinetic	kenetic
39	lengual	lingual	linggual
40	mikroscopy	microscopy	microscapy
41	mut	moot	moote
42	nocturnal	nocternal	nocturnol
43	optics	opticks	opticts
44	pevish	peevish	peevvish
45	tantamunt	tantimount	tantamount
46	quizzical	quizical	quizzicol
47	elavation	elevation	elevasion
48	diversity	divercity	daversity
49	titan	titon	tighton
50	cryptogram	kryptogram	cryptigram

In an effort to continually improve, AT&T intermittently conducts skill-based contests such as the "Relay Olympics" that CAs participate in to win prizes. These skill-based contests reinforce typing speed and accuracy, spelling, and other necessary relay skills.







Clear and Articulate Voice

AT&T understands the importance of CA team member's ability to demonstrate clear and articulate voice communications. During the initial hiring process, we test and qualify our workforce on a verbal test that filters for possible

concerns regarding clear and articulate speech. All AT&T CAs speak to voice users in a clear, concise, and understandable manner.

During both initial and subsequent training sessions, we cover sensitivity issues to ensure CAs have an understanding of the importance of using crisp enunciation and appropriate pacing so that relay users will easily understand what they say. We use trainer-led role play methods as well as having CAs tape their own voice to become more aware of speaking clearly.

Here's what our Relay Service callers say about our Communication Assistants.

From a caller in Virginia,

"The CA was amazing. She had excellent inflection, gave continuous updates for the hearing party, and appropriately verified spelling of uncommon names. I was seriously impressed."

This comment was unsolicited.

CA Observations

AT&T regularly evaluates CAs by doing "official" written observations a minimum of once per month for each CA. Typical observations will include approximately five calls. Relay calls are observed by a manager who completes a call sheet and provides immediate feedback after completion of a call. CAs are evaluated on proficiency in call processing, professionalism, appropriate tone of voice for subject matter, grammar, spelling, ASL interpretation, etiquette, and knowledge and skill required to process relay calls.

Observation forms provide valuable feedback and coaching opportunities. When necessary, employees are scheduled for follow-up training to improve in areas they require development. Observation scores are also used for AT&T's Pay for Performance plan that provides substantial monetary payouts for quality observations and other important metrics such as attendance.

Monthly Quality Assurance Test Calls







AT&T has an organization external to Relay Services that conducts monthly test calls to evaluate CA performance. This is referred to as our World Class Customer Care (WCCC) organization. Members of that organization develop scripted relay calls to place to each of our centers. The WCCC team members are well-versed in relay requirements and place test calls to evaluate the quality of our service and to provide feedback to CAs. This organization is external to Relay Services and totally unbiased. Results from these test calls are used for a portion of AT&T's generous Pay for Performance plan. AT&T recognizes the importance of providing quality service and reinforces that through our Pay for Performance.

Conversational Tone of Voice

This CA exemplifies our effort to provide outstanding customer service.

From a caller in Pennsylvania, "CA 7302 was wonderful. She was smooth and relaxing, and she had a nice speed of talking. I didn't realize that I was on the phone for over 45 minutes with my sister. This was the most pleasant CA I have ever had."

This comment was unsolicited.

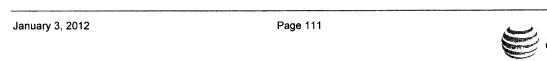
AT&T CAs adopt conversational tones for intonation, content, and spirit. Our CAs have excelled in appropriate voice tone, inflection, and pitch pertinent to the conversation. We require our CAs to sign a Code of Ethics statement which includes. "CAs will convey the content and the spirit of the speaker." We train CAs extensively on these skills. We use role-playing during initial and subsequent training to help CAs develop an appropriate conversational tone of voice and pace so they read with intonation and fluency. We train our CAs to use an

appropriate tone for the subject matter being discussed on a relay call.

Conveying Tone of Voice to TTY User

AT&T recognizes the importance of conveying "tone of voice" to the TTY user. Our CAs are trained to provide this information to the TTY user and to describe the person's tone of voice based on concrete sounds and always in parentheses. Some acceptable descriptions would include:

- (sounds mad speaking very loud),
- (sounds happy laughing),
- (sounds upset..crying) or





• (sighing.. talking to someone else).

AT&T is willing to make changes or add acceptable descriptions for conveying tone of voice to the TTY user as directed by the FPSC.

Background Noise

We also train CAs to type background noise as heard during the call. AT&T has several macros designed to assist our CAs in giving background noises. These macros include items such as

- (phone ringing),
- (coughing),
- (sneezing),
- (speaking to someone else),
- (yelling),
- (doorbell),
- (laughing),
- (dog barking),
- as well as many others.

Use of macros enables our CAs to provide background noise while continuing to relay verbatim the conversation as it is spoken. As shown above, background noises are always typed in parentheses. If a relay user does not wish to be provided background noises during a particular call, they may instruct the CA not to provide this information. This is also an option in the Relay Choice Profile. We'll gladly provide a full list of our macros at your request.

Relaying in Real Time

AT&T CAs will relay in real time and will convey the full content, context, and intent of all communication. TRS CAs will relay verbatim unless requested otherwise by the caller and/or recognized by the relay CA as an ASL call requiring translation. Our CAs







receive extensive training on the absolute necessity of relaying verbatim without changing the intent of the communication process.

Gender Request

AT&T Relay CAs will provide their ID number and gender at the beginning and end of every relay call, as well as when there is a change of CA during a call. A customer may request to have a male or female CA complete their call, and AT&T CAs will make every effort to accommodate these requests.

When a customer requests a different gender CA to complete their call, the CA will advise the caller, "Please hold while I check to see if a male/female CA is available." If a CA of the requested gender is available, the CA informs caller, "Thank you for holding. We are able to accommodate your request. I am transferring your call now. One moment please." The call is immediately transferred to the relief CA. If the caller is TTY, the message, (relief ca xxxx m/f) is provided. If the caller is voice, the message, "Relief CA xxxx continuing your call" is provided.

If it is necessary to transfer the call to another CA while the call is still in process, every effort will be made to ensure the call is transferred to a CA of the requested gender.

In the unlikely event that a CA of the requested gender is unavailable, the CA will inform caller, "Thank you for holding. I'm sorry, at this time we do not have a male/female CA available for your call. I would be happy to complete your call for you now, or you may want to try your call later."

CA Relief

As a matter of practice, AT&T minimizes transfers and reliefs to the extent possible. AT&T CAs only transfer calls when necessary. A change never takes place until either the calling or called party has completed their part of the conversation (typed or stated GA). Prior to transferring, CAs will ensure that they have been processing a call for a minimum of ten (10) minutes for traditional relay and fifteen (15) minutes for Speech-to-Speech Service. The only exception is when a customer requests to be transferred to a different CA. Requests for the same CA to relay the entire conversation will be honored whenever possible.

When it is necessary to transfer a relay call, AT&T's sophisticated relay platform allows for a fully electronic transfer of the call. This takes only seconds and is done at non-







intrusive junctions on a call that has already met minimum time requirements. Other relay provider platforms do not have the ability to transfer a call electronically. A manual relieve takes much longer to occur given that CAs must change seats and plug in new headsets before assuming the call. Our electronic transfer ability allows for full transition of the call including any notes indicated by the CA in their scratchpad for processing of the call. This is a highly efficient process that does not disrupt the call underway.

Due to the complexity of Speech-to-Speech calls, CA reliefs are "manual" reliefs only. The relief STS CA will go to the CA position to complete the remainder of the call.

When a call is transferred to a relief CA, TTY customers are notified by the macro bearing the relief CA's identification number and gender. Voice customers are notified by the announcement, "relief ca XXXX continuing your call." These notifications are provided promptly when the call is transferred, which takes place only at non-disruptive junctures between the TTY and Voice parties' conversation.

If a gender request has been made, every effort will be taken to transfer the call to a relief CA of the requested gender.

During call transfers, call detail information that has been provided by the TTY user and Customer Profile information remains available to the relief CA.

4.2.1.2 Confidentiality and conversation content. Except as authorized by a store. So, and Communications. Act. 17 U.s. C. § 605. C. Vs are prohibited to a cusclessury content of any school form as ation regardless of content, and with a limit on a consistency of some stores and keeping records of the content or into a oversation be on a solar ation of a call, even in to be so would be increasing a way standard or by a time so a good of a call of the content and an order to a copy of the call of the solar as a time rounds to be up in the call of may record that the tree value of the call of the call





AT&T Response:

AT&T has read and meets this requirement.

AT&T has a strong corporate history of protecting customer privacy and customer information. Protecting customers and honoring their privacy is a value that is deeply embedded in all we do, in every job performed at AT&T. Our corporate guidelines for business ethics and behavior, called the AT&T Code of Business Conduct specifically cite protection of customer information and privacy as a paramount responsibility of every employee. We re-train and re-commit every AT&T employee every year regarding the confidentiality of our customers' information; all our employees serving relay callers make this commitment.

The following documents, "CA Pledge of Confidentiality," and "CA Code of Ethics," are reviewed with Communications Assistants annually, and during performance reviews occurring monthly and semi-annually. AT&T CAs understand their important role in the communication process, and the expectation for absolute confidentiality. AT&T Communications Assistants understand that breaches of confidentiality —even if unintentional or a first-time offense- have serious ramifications, such as dismissal. The Pledge of Confidentiality is posted in each Relay Center.







Colorado Relay Service Confidentiality Agreement

do hereby recognize the serious and confidential nature of the Colorado Relay Service. I recognize the responsibility this places upon me and its bearing on my continued employment. By agreeing to employment in a Communications Assistants, supervisor or customer service role, I agree to the following conditions:

- 4. I will not disclose to any individual, including fellow Communications Assistants (CAs), Customer Service Representatives and supervisors, the identity of any caller or information I may acquire about a caller while relaying his/her conversation, except if the user is in life threatening circumstances or causes an emergency situation, or in instances of resolving a complaint.
- 5. Under no circumstances will I act upon any information I may acquire while relaying conversations.
- 6. I will not allow any individual to watch or listen while processing actual calls, except for authorized training and quality_monitoring purposes.
- 7. Except when performing Speech-to-Speech or Captioned Telephone Service relay, I will not bring any recording devices, including but not limited to, pens, pencils and Personal Digital Assistants (PDAs), into relay workspace.
- 8. I will not keep any written or electronic form of a conversation beyond the duration of the call, except as allowed for Speech-to-Speech Relay service.
- 9. Except for any information necessary for billing purposes or gathering caller profile or 7-1-1 information when requested by the caller, I will not collect nor use a caller's personal information.
- 10. I will not register my company as the caller's VRS relay provider of choice without the expressed permission of the caller. When explaining about a caller's choice of relay providers I will strive to ensure that the caller receives a clear, accurate and forthright understanding of his or her options and of the registration process. I will not engage in deceptive practices that result in obtaining a caller's permission deceitfully.
- 11. Under no circumstances will I reveal my relay operator number in conjunction with my name, or disclose to anyone the names, schedules or personal information of any fellow CA or supervisor working at the relay service.







- 12. I understand that the FCC requires me to relay everything that is said by either party even if portions of the conversation are offensive to me personally.
- 13. In the event of my resignation or termination of my employment, I will continue to hold in strictest confidence all information related to the work I have performed as a relay operator.

I understand further that any of the above breaches in confidentiality will lead	to
disciplinary action up to and including immediate dismissal.	

Signature:	
Print Name:	
Position:	Date:









AT&T Relay Services

CA CODE OF ETHICS

- 1. Communications Assistants will keep all call information strictly confidential. The only exception to this is if a call has to be transferred to another CA or the In-Charge Desk.
- 2. Communications Assistants must never give out telephone numbers.
- 3. Communications Assistants must never give out information about themselves except their gender and CA number.
- 4. Communications Assistants will convey the content and spirit of the speaker.
- 5. Communications Assistants will not counsel, advise nor express personal opinions except the tone of voice of the voice person.
- 6. Communications Assistants, as employees of AT&T, will strive to maintain high professional standards in compliance with the Code of Ethics and AT&T's Code of Business Conduct.

I have read and understand each of the Codes and I hereby pledge to abide and uphold the Code of Ethics.

Name (sign)	
Name (print)	
Date	

This Code of Ethics, and the f CA Pledge of Confidentiality, is reviewed with each Communications Assistant annually, and during performance reviews occurring monthly and semi-annually. AT&T Communications Assistants understand their important role in the communication process, and the expectation for absolute confidentiality. AT&T Communications Assistants understand that breaches of confidentiality —even if unintentional or a first-time offense-have serious ramifications, such as dismissal.







Every CA is required to adhere to the rules of confidentiality during all training sessions. Trainers are trained to present scenarios and procedures without revealing names or specifics about the callers.

All CAs are then required to sign the Pledge of Confidentiality previously discussed, promising not to disclose the identity of any caller, fellow CA, or any information learned during the course of relay calls. This applies to all Relay Service personnel during the period of employment and after termination of employment.

The Pledge of Confidentiality, along with the Code of Ethics, is posted at each workstation within the call center and in all reference tools. The Relay Team fully understands the serious ramifications for violations of the Confidentiality responsibilities placed upon them. We are pleased to report we have received no allegations of confidentiality breaches to date.

AT&T does not maintain a written or electronic script of any type beyond the duration of the call. We place great emphasis on maintaining the confidentiality of relay users. All typed text scrolls off of the screen, so that nothing is retrievable after a call is complete. Billing records are sent electronically by our automated CA platform, and thus no billing records are retained onsite or at the CA position. This eliminates any possibility for a confidentiality breech of this type of information.

AT&T facilities are designed with confidentiality in mind. Each CA is assigned a locker in a separate area of the building for personal items and cell phones to be kept while they are working.

AT&T is well-versed on customer privacy. To raise awareness and emphasize compliance, our employees receive annual training on maintaining customer privacy. All AT&T employees are also covered annually on AT&T's Code of Business Conduct. This is an extensive document and annual training is conducted via CBT to ensure that all employees are familiar with AT&T's Code of Business Conduct. This training includes confidentiality of customer information as well as protection of proprietary information. It is a thorough training that presents employees with scenarios that they must choose the ethical and correct response to. This reinforces concepts in our CA code of ethics as well as in our Pledge of Confidentiality and also includes many more important topics.

Relaying Conversation



